

STATE OF COLORADO

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Colorado Department
of Public Health
and Environment

December 28, 2010

Matt Craddock
New Mission, LLC
337 E. Pikes Peak Ave., Suite 200
Colorado Springs, CO 80903

RE: Integrated (Phased) Corrective Action Plan – King’s One-Hour Cleaners

Dear Mr. Craddock,

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (CDPHE) has reviewed your proposed corrective action plan (CAP) dated September 30, 2010. This document also reports the results of the investigation outlined in the CDPHE-approved work plan. These reported findings demonstrate that the requirements in the work plan have been met and the nature and extent of the hazardous waste contamination has been sufficiently characterized to allow remediation at the King’s One-Hour Cleaners facility to begin. The CDPHE hereby approves the CAP on condition that it is modified to include additional requirements listed below.

1. Installation of a groundwater monitoring well is required at the site boundary southeast of MW-2 to help bound the groundwater plume. This well should be completed so that it penetrates and can sample the entire aquifer and any dense non-aqueous phase liquids it contains. This well should also be sampled in a fashion that will determine whether the contaminant concentrations are stratified in the alluvial aquifer (e.g., HydraSleeve sampler).
2. Potential use of a soil vapor extraction (SVE) system is proposed in the CAP. The final design of this system must be approved by CDPHE prior to installation. Depending on the results of this and other remediation required in the CAP, additional extraction methods may be required.
3. Any plans to inject chemical oxidants must be submitted to CDPHE for further approval.
4. The plan proposes to place horizontal piping in the base of the excavation for future use to remediate residual contamination that cannot be physically removed, used either for

King's One Hour Cleaners

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M&E Records - Correspondence - From Agency - Intergrated
(Phased) Corrective Action Plan

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vapor extraction or the injection of chemical oxidants. Any system installed should be capable of remediating contamination not only laterally, but vertically throughout the soil column down to the water table. All contamination residing within the soil column that is capable of leaching and degrading water quality must be removed.

5. The downgradient extent of the plume is undefined. New Mission, LLC shall identify and plot the locations of all ground water wells between S-14 and S-11 in the Widefield Aquifer, regardless of their purpose and who installed, monitors or operates the wells. Upon receipt of this information, New Mission, LLC shall evaluate the available locations and perform the following in an effort to begin the process of delineating the contamination in this water supply aquifer: either select and sample existing wells or install and sample no less than two wells in the path of the contaminant plume.
6. Ground water quality should also be monitored in select wells downgradient of the facility to evaluate the effectiveness of the corrective actions. At a minimum, the following wells shall be included in that effort: TM-14, TM-10, TM-16 and WSP-6. Justification for substituting other wells for one or more of the listed wells may be proposed.
7. Using existing data and/or following the collection of new data (pumping tests, collection of fraction of organic content data, etc.), New Mission, LLC shall calculate and/or model average contaminant travel times between the Mission Trace Shopping Center and well S-14. The results of this analysis, to aid in determining how quickly improvements in water quality will be observed in other wells located in the alluvial aquifer, shall be documented in a report submitted to the CDPHE for its review and approval.
8. CDPHE also requires that New Mission, LLC provide the means to return the S-14 water supply well to service. Until remediation at the King's One Hour Cleaners site results in contaminant levels in the aquifer at S-14 that are below state drinking water standards, New Mission, LLC must fund a method of treatment or offer an alternate water supply for the Security Water District. This action will necessitate meeting with the Security Water District, determining viable treatment alternatives, designing and implementing a treatment alternative within the timeframes specified below.
9. Monitoring and Reporting:
 - First year – quarterly sampling and reporting for all on-site wells plus semiannual monitoring of the four off-site wells noted above.
 - Until one year following attainment of remedial goals - semi-annual sampling and reporting for all on-site and the four off-site wells.The CDPHE reserves the right to change the monitoring frequency at any time during the implementation of this CAP if data received warrant increasing or decreasing sampling frequency.

This CAP should be implemented as soon as possible to eliminate this source of groundwater contamination according to the following schedule:

- Complete excavating contaminated soil from beneath the building and sewer line within 90 days of receipt of this approval letter.
- Install, sample and report the test results from the one monitoring well located at the site boundary southeast of MW-2 within 90 days of receipt of this approval letter.

- Submit to the CDPHE, for review and approval, a report documenting the work completed and confirmation sample results following completion of the soil and sewer line removal activities, within 120 days of receipt of this approval letter.
- Submit to the CDPHE a report documenting the results and methods used to calculate average contaminant travel times between the Mission Trace Shopping Center and well S-14 within 120 days of receipt of this approval letter.
- Submit to the CDPHE, for review and approval, a work plan to either sample existing wells or install new monitoring wells in the area between S-14 and S-11 in the Widefield Aquifer within 120 days of receipt of this letter.
- Submit to the CDPHE, for review and approval, a work plan to treat residual soil contamination in the vicinity of excavated areas that is also capable of treating contamination in the soil column down to the water table. This work plan shall be submitted to the CDPHE within 150 days of receipt of this approval letter.
- Submit to the CDPHE, for review and approval, a work plan to treat contaminated ground water above standards found in S-14 within 180 days of receipt of this approval letter. This work plan should include an implementation schedule and should summarize discussions and planning meetings held with the Security Water District, alternatives evaluated, and the selected treatment method.

CDPHE has been in contact with Region 8 of the Environmental Protection Agency (EPA) regarding whether their Emergency Response program can provide assistance for treatment at S-14. Any response from EPA will be forwarded.

Based on the results of these corrective actions, additional requirements may be imposed in order to return the affected aquifer to a usable condition.

If you have any questions regarding the approval of the CAP with the additional requirements provided in this letter, please contact me at carl.spreng@state.co.us or at 303-692-3358.

Sincerely,



Carl Spreng
Hazardous Materials Corrective Action Unit

cc: Larry Keefe, Terracon Consultants
Peter Keppler, Attorney
Rob Eber, AGO